

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY (TRENTON) Caption in Compliance with D.N.J. LBR 9004-2(c)	
MAURICE WUTSCHER, LLP 5 Walter E. Foran Blvd., Suite 2007 Flemington, NJ 08822 (908) 237-4550 Attorneys for Creditor Cavalry SPV I, LLC as assignee of Citibank, N.A. Thomas R. Dominczyk	Chapter 7 Case Number: 22-17381-KCF
In re: MICHAEL PATRICK SIANO	JUDGE: Honorable Kathryn C. Ferguson

**RESPONSE OF CAVALRY SPV I, LLC AS ASSIGNEE OF CITIBANK N.A. TO
THE DEBTOR’S OBJECTION TO CLAIM NUMBER 1**

Now comes Cavalry SPV I, LLC (hereinafter “SPV” as assignee of Citibank, N.A. and for its response to the Debtor’s Objection to Claim Number 1 of Cavalry SPV I, LLC as assignee of Citibank, N.A. in the amount of \$2,387.14 and states as follows:

1. SPV is the assignee of Citibank, N.A. and the current Creditor on this claim.
2. N.J.S.A. 45:18-1 provides that “No person shall conduct a collection agency, collection bureau or collection office in this state, or engage therein in the business of collecting or receiving payment for others of any account, bill or other indebtedness, or engage in the business of soliciting the right to collect or receive payment for another of any account, bill or other indebtedness, or advertise for or solicit in print the right to collect or receive payment for another of any account, bill or other indebtedness, unless such person, or the person for whom he may be acting has on file with the secretary of state sufficient bond as hereinafter specified.” (emphasis added).

3. There are no allegations in Debtor's objection that SPV is collecting debts for others as required by the statute. Rather, SPV is the current creditor on the claim and as such is not required to be bonded under the statute.

4. In addition, contrary to the objection SPV is actively licensed as a Consumer Lender and as a Sales Finance Company as set forth on the attached records from the State of New Jersey Department of Banking and Insurance. See Exhibit A.

5. Debtor's Objection to Claim lacks merit and should be overruled.

6. Cavalry SPV I, LLC as assignee of Citibank, N.A. has an allowable unsecured claim in the amount of \$2,387.14.

WHEREFORE, Cavalry SPV I, LLC as assignee of Citibank, N.A. respectfully requests this court to deny the Debtor's Objection to Claim Number 1 and find that it has an allowed unsecured claim in the amount of \$2,387.14.

Respectfully submitted,
Maurice Wutscher, LLP
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Attorneys for Cavalry SPV I, LLC as assignee of
Citibank, N.A.

By: s/ Thomas R. Dominczyk
Thomas R. Dominczyk

Dated: June 16, 2023

SERVICE LIST
In re MICHAEL PATRICK SIANO
22-17381-KCF

Michael Patrick Siano
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Lanoka Harbor, NJ 08734

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U.S. Trustee
US Dept of Justice
Office of the US Trustee
One Newark Center Ste 2100
Newark, NJ 07102

Exhibit “A”



STATE OF NEW JERSEY
DEPARTMENT OF BANKING & INSURANCE

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[Description of Terms and Codes](#)

New Search

Licensee Name	Ref Num	Business Name Address	License Type	Status	Authorities
CAVALRY SPV I LLC	1200609	CAVALRY SPV I LLC 500 SUMMIT LAKE DRIVE SUITE 400 VAL HALLA, NY 10595	CONSUMER LENDER (CORPORATION)	ACTIVELY LICENSED	N/A
CAVALRY SPV I LLC	1200609	CAVALRY SPV I LLC 500 SUMMIT LAKE DRIVE SUITE 400 VAL HALLA, NY 10595	SALES FINANCE COMPANY (CORPORATION)	ACTIVELY LICENSED	N/A

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New Jersey Department of Banking and Insurance